

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**Twana Ahmed, Individually and on
Behalf of all Others Similarly Situated,**

Plaintiffs,

V.

**USAPD, LLC., D/B/A USA Patrol
Division, and Isam Samara**

Defendants

CIVIL ACTION NO. 4:19-cv-03620
Collective Action

SECOND JOINT MOTION TO CONTINUE AND FOR EXTENSION OF DEADLINES

TWANA AHMED, et al., and USAPD, LLC., et al., (hereinafter “Parties”), by and through their undersigned counsel, hereby file their second motion to continue and extend pre-trial deadlines and state as follows:

1. The Parties filed their first Motion to Continue on September 25, 2020 (Doc. 27). The Motion was filed and granted as the Parties were awaiting the Court’s ruling on Plaintiffs’ Motion for Conditional Certification (Doc. 20). Pursuant to the Court’s Order on September 28, 2020 (Doc. 28), the following deadlines remain in place:

Discovery deadline: 3/1/2021
Motions deadline: 04/20/2021
Joint Pretrial Order
(Defendants' final version due to Plaintiff): 07/12/2021
Joint Pretrial Order
(Plaintiff filing deadline and Motions in Limine deadline): 07/06/2021
Docket Call: 07/16/2021 at 1:30pm
Trial: 07/19/2021 at 9:00am

2. The Parties are still waiting for a ruling on plaintiffs' motion for conditional certification. The Parties have engaged in minimal discovery in anticipation of the conditional certification ruling. The resolution of said motion will substantially affect the course of litigation and the parties do not want to run up legal fees and costs without knowing how many plaintiffs will be involved in this case.

3. In light of the foregoing, the Parties propose to extend all the pretrial deadlines and continue the trial as follows:

- a. Discovery deadline: 4 months after the court rules on plaintiffs' motion for conditional certification;
- b. Motions deadline: 6 months after the court rules on plaintiffs' motion for conditional certification;
- c. Joint Pretrial Order (Defendants' final version due to Plaintiff): 10 months after the court rules on plaintiffs' motion for conditional certification;
- d. Joint Pretrial Order (Plaintiff filing deadline and Motions in Limine deadline): 10 months and one week after the court rules on plaintiffs' motion for conditional certification;
- e. Docket Call: 11 months after the court rules on plaintiffs' motion for conditional certification;
- f. Trial: 11 months and 1 week after the court rules on plaintiffs' motion for conditional certification.

4. This motion is made in good faith and is not sought for delay, but so that justice may be done.

PRAYER

For the foregoing reasons, the Plaintiffs and the Defendants respectfully move that this Court continue the various settings as discussed above; and for all other relief, at law or in equity, to which the parties may be entitled.

Respectfully submitted,

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